

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Robert Davto Price

Case: 2:24-mj-30467

Case No. Assigned To : Unassigned

Assign. Date : 10/30/2024

Description: COMP USA V. SEALED  
MATTER (KB)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 6, 2024 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: October 30, 2024City and state: Detroit, Michigan  
Complainant's signatureKara Klupacs, Special Agent-ATF  
Printed name and title  
Judge's signatureHon. Anthony P. Patti, United States Magistrate Judge  
Printed name and title

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Kara Klupacs, being first duly sworn, hereby state:

**INTRODUCTION**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and have been since March 2018. I am currently assigned to the Detroit Field Division Group 1. I graduated from the Federal Law Enforcement Training Center and ATF Special Agent Basic Training. Prior to becoming an ATF Special Agent, I served eight years as a U.S. Customs and Border Protection and U.S. Secret Service Uniformed Division Officer. During my employment with the ATF, I have conducted and/or participated in dozens of criminal investigations involving the possession and use of firearms, armed drug trafficking, criminal street gangs, and other state and federal offenses. I have obtained numerous federal search warrants for residences, vehicles, social media accounts, cell phones, and other electronic storage devices, and fully participated in those searches.

2. This affidavit is made in support of a criminal complaint for Robert Davto PRICE. Probable cause exists that PRICE knew he was a convicted felon and knowingly possessed a firearm, in violation of 18 U.S.C. § 922(g)(1).

3. I make this affidavit based on my participation in this investigation, reports from other law enforcement agents, communications with others who have

personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

4. The information in this affidavit is for the limited purpose of establishing probable cause and does not contain all details or all facts relating to this investigation.

### **PROBABLE CAUSE**

5. On October 6, 2024, Detroit Police Department (DPD) officers were inside Ashley's Liquor Store at 9000 Hayes St., Detroit, MI 48213. While inside the store, officers saw an individual, later identified as Robert PRICE, begin to enter the front door of the store. The officers noticed that PRICE's front right pants pocket appeared to be weighed down and had an imprint in the shape of a handgun. PRICE spotted the officers and reached towards his front right pants pocket, then he turned and exited the store. PRICE fled southbound, crossing Harper Avenue.

6. DPD officers pursued PRICE on foot. During the chase they observed PRICE pull out a firearm from his pocket and throw it to his right, where it collided with dumpsters on the south side of Harper Avenue. PRICE continued to flee, running onto the I-94 interstate westbound lanes, where he was stopped and handcuffed by officers.

7. Once detained, officers asked PRICE if he had a valid CPL, and he said he did not. Officers ran PRICE in LEIN and confirmed he did not have a valid CPL.

8. Officers returned to the area where PRICE threw the firearm and found a loaded Glock model 22, .40 caliber pistol. The pistol was loaded with 14 rounds with one round chambered.

9. Officers arrested PRICE for carrying a concealed weapon and transported him to the Detroit Detention Center (DDC) for processing. While waiting to be processed at the DDC, PRICE told officers that he was carrying the gun because “me and my baby mama got jumped by some people.”

10. I reviewed PRICE’s computerized criminal history which revealed the following felony convictions:

- a. On December 18, 2009, PRICE pled guilty to one count of Fleeing and Eluding – Third Degree – Vehicle Code in the Third Circuit Court for Wayne County.
- b. On January 31, 2014, PRICE pled guilty to one count of armed robbery in the Third Circuit Court for Wayne County. PRICE was sentenced to 3 to 20 years in prison.

11. Because PRICE spent more than one year in prison for his armed robbery, there is probable cause to believe that PRICE is aware he is a felon.

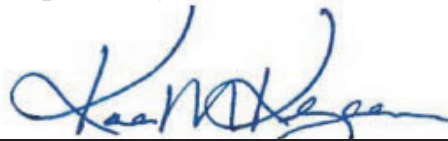
12. The recovered firearm is a Glock model 22, .40 caliber pistol. As an ATF Firearm Interstate Nexus agent, it is my opinion that this firearm is a firearm as defined under 18 U.S.C. § 921 and was manufactured outside of the state of

Michigan after 1898, and therefore has traveled in and affected interstate commerce.

### CONCLUSION

13. There is probable cause to believe that on October 6, 2024, within the Eastern District of Michigan, Southern Division, Robert PRICE, a convicted felon, knowingly possessed a firearm which had traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



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Kara Klupacs, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms, and Explosives

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



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Hon. Anthony P. Patti  
United States Magistrate Judge

Date: October 30, 2024